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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

TIARE RAMIREZ, an individual;

Plaintiff,

vs.

WYNN LAS VEGAS, LLC; DOES I
 through X; and ROE Corporations XI
 through XX inclusive,

Defendant.

Case No. 2:19-cv-01174-APG-BNW

**STIPULATION AND ORDER TO
 EXTEND JOINT PRETRIAL ORDER
 DEADLINE**

(Sixth Request)

**STIPULATION AND ORDER TO EXTEND
 JOINT PRETRIAL ORDER DEADLINE**

The parties, by and through their respective attorneys of record, hereby stipulate to a fourteen (14) day extension up to and including April 25, 2023, to file the Joint Pretrial Order. Per LR IA 6-1, Defendant filed the first Stipulation and Order to extend the Joint Pretrial Order Deadline on September 7, 2022 (ECF No. 78), Plaintiff filed the second Stipulation and Order to extend the Joint Pretrial Order Deadline on October 27, 2022 (ECF No. 80), Plaintiff filed the third Stipulation and Order to extend the Joint Pretrial Order Deadline on November 21, 2022 (ECF No. 82), Plaintiff filed the fourth Stipulation and Order to Extend the Joint Pretrial Order Deadline on December 22, 2022 (ECF No. 84), and Plaintiff filed the fifth Stipulation and Order to Extend the Joint Pretrial Order Deadline on March 8, 2023 (ECF No.86). To date, the parties are working and conferring

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1 together to complete the Joint Pretrial Order to completion and finalization. This is
2 the sixth request for extension to file Joint Pretrial Order. The deadline for the
3 Joint Pretrial Order is currently April 11, 2023. See ECF No. 87. Plaintiff has
4 requested this extension and Defendant has agreed to the request.

5 Good cause exists for such extension. Defendant has tendered a draft of
6 JPTO to Plaintiff. Plaintiff and Defendant are meeting and conferring to complete
7 such JPTO requirements in order to submit a finalized JPTO. Specifically, the
8 parties have discussed multiple items in the current draft of the JPTO regarding,
9 *inter alia*, potentially stipulated facts, issues, and exhibits, and anticipate
10 presenting a finalized version of the JPTO to this Court shortly. Additionally,
11 Plaintiff's counsel has prior scheduled travel commitments, needs to tend to
12 personal family matters including matters relating to his father's medical
13 prognosis, his ongoing legal matters, and requires the extension to conduct due
14 diligence and potentially streamline various issues. Simultaneously, a key
15 employee required leave to deal with a debilitating medical condition. Further, the
16 parties are working together in good faith to explore parameters and issues
17 related to possible resolution of this matter.

18 Accordingly, the parties stipulate to extending the deadline to file the Joint
19 Pretrial Order deadline to April 25, 2023.

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This request is not sought for any improper purpose or other reason of delay. No party is prejudiced by the requested extension.

IT IS SO STIPULATED.

Dated: April 10, 2023

Dated: April 10, 2023

Respectfully submitted,

Respectfully submitted,

/s/ Christian Gabroy

/s/ Kelsey Stegall

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IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE,
UNITED STATES MAGISTRATE JUDGE

Dated: April 12, 2023

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